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DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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Attorneys for Complainant

**BEFORE THE
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. OT 2005-221

SUSAN LYNN COX
231 Luna Circle
Folsom, California 95630

A C C U S A T I O N

Occupational Therapist License No. OT7326

Respondent.

Complainant alleges:

PARTIES

1. Heather Martin (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the California Board of Occupational Therapy, Department of Consumer Affairs.

2. On or about December 9, 2003, the California Board of Occupational Therapy issued Occupational Therapist License Number OT 7326 to Susan Lynn Cox (Respondent). Said license will expire on September 30, 2010, unless renewed.

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...
"(d) Occupational therapy practitioners shall perform occupational therapy services only when they are qualified by education, training, and experience to do so.

(1) Occupational therapy practitioners shall hold the appropriate credentials for the services they provide."

...
"(f) Occupational therapy practitioners shall provide accurate information about occupational therapy services.

(1) Occupational therapy practitioners shall accurately represent their credentials, qualifications, education, experience, training, and competence."

...
(3) Occupational therapy practitioners shall refrain from using or participating in the use of any form of communication that contains false, fraudulent, deceptive statements or claims."

FIRST CAUSE FOR DISCIPLINE

(False Statements in Connection with Applications or Issuance of Licenses)

7. Respondent is subject to disciplinary action for unprofessional conduct under Business and Professions Code sections 2570.28(d) and (h) in that she made false statements in connection with her applications for advanced practice certificates with the Board in the areas of "Hand Therapy" and "Physical Agent Modalities" as follows:

a. On or about July 4, 2007 respondent signed, under penalty of perjury, an application for advanced practice approval in the area of "Physical Agent Modalities" that contained false information in the form of forged certifications of work experience containing incorrect information that was not documented by the certifier.

b. On or about October 1, 2007 respondent signed, under penalty of perjury, an application for advanced practice approval in the area of "Hand Therapy" that contained false information in the form of forged certifications of work experience containing incorrect information that was not documented by the certifier

1 8. Respondent is subject to disciplinary action for unprofessional conduct
2 under Business and Professions Code sections 2570.28(d) and (h) in that she made false
3 statements in connection with her application for examination to become a certified as a
4 "Certified Hand Therapist" (CHT) with the Hand Therapy Certification Commission (HTCC) as
5 follows:

6 a. On or about June 22, 2003, June 29, 2005, and June 21, 2006,
7 respondent submitted applications to take the examination to become a CHT with HTCC that
8 contained false information in the form of certifications of work experience with forged
9 signatures.

10 **SECOND CAUSE FOR DISCIPLINE**

11 **(Failure to Hold Appropriate Credentials)**

12 9. Respondent is subject to disciplinary action under Business and
13 Professions Code section 2570.28 (g) and regulation section 4170 (d) (1) in that she practiced as
14 an occupational therapist without a license between the dates of January 1, 2003 and December
15 9, 2003.

16 **THIRD CAUSE FOR DISCIPLINE**

17 **(False, Fraudulent, or Deceptive Communications and inaccurate representation of**
18 **experience)**

19 10. Respondent is subject to disciplinary action under regulation section 4170
20 (f)(3) for false or fraudulent communications and 4170 (f)(1) inaccurate representation of
21 experience, as set forth in paragraphs 7 and 8 and all their sub parts above.

22 **FOURTH CAUSE FOR DISCIPLINE**

23 **(Violation of Regulations and Chapter)**

24 11. Respondent is subject to disciplinary action under Business and
25 Professions Code section 2570.28(c) in that she violated Code section 2570.28(d) and
26 Regulations 4170 (d) (1) and 4170 (f)(1) and (3) as set forth above in the first, second, and third
27 causes for discipline.

28 ///

1 PRAYER

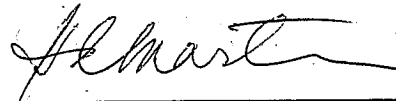
2 WHEREFORE, Complainant requests that a hearing be held on the matters herein
3 alleged, and that following the hearing, the California Board of Occupational Therapy issue a
4 decision:

5 1. Revoking or suspending Occupational Therapist License Number OT
6 7326, issued to Susan Lynn Cox Susan Lynn Cox.

7 2. Ordering Susan Lynn Cox to pay the California Board of Occupational
8 Therapy the reasonable costs of the investigation and enforcement of this case, pursuant to
9 Business and Professions Code section 125.3;

10 3. Taking such other and further action as deemed necessary and proper.

11
12 DATED: April 20, 2009

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14 

15 HEATHER MARTIN
16 Executive Officer
17 California Board of Occupational Therapy
18 Department of Consumer Affairs
19 State of California
20 Complainant

21 SA2008306295

22 Cox accusation.wpd
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